### UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

H.B.,	) CIVIL ACTION FILE
Plaintiff,	) ) NO. 1:22-cv-01181-JPB
V.	)
RED ROOF INNS, INC., et al.,	)
Defendants.	)

# MOTION IN LIMINE TO EXCLUDE EVIDENCE OF INCIDENTS AND CRIMES AT OTHER RED ROOF INNS

Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) move this Court for an Order in limine excluding evidence of incidents and crimes at Red Roof Inns other than the Red Roof Inn Norcross (RRI Norcross). This evidence is not relevant to Plaintiff's claims and would cause undue delay, mislead and confuse the jury as to the ultimate factual issues, and carry significant danger of unfair prejudice to the RRI Defendants. This Court should exclude this evidence at trial.

A Memorandum in Support is filed contemporaneously and incorporated fully.

Dated: October 21, 2024 Respectfully submitted,

#### /s/ Marcella C. Ducca

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## **LOCAL RULE 7.1(D) CERTIFICATION**

Counsel certifies that this motion has been prepared with Times New Roman size 14 pt font, which is one of the font and point selections approved by the Court in Local Rule 5.1. This motion does not contain more than 10 characters per inch of type.

Dated: October 21, 2024 /s/ Marcella C. Ducca

Marcella C. Ducca

One of the Attorneys for Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2024, a copy of the above was filed electronically. Service of this filing will be made under Fed. R. Civ. P. 5(b)(2)(E) through this Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Marcella C. Ducca

Marcella C. Ducca

One of the Attorneys for Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC